

LAW OFFICES OF
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December 3, 2021

VIA ECF

Hon. Katherine Polk Failla
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *United States of America v. Christian Baez*, 19 Cr. 690 (KPF)

Dear Judge Failla,

I am counsel to defendant Christian Baez in the above-captioned case. I write to respectfully request a modification of my client's pretrial release status. Mr. Baez is seeking to make a one-day trip outside of his specified judicial districts to get his car fixed following an accident earlier this week. His insurance does not cover collision damage so he has located the most affordable mechanic in the area. The mechanic is located in South River, NJ at an exact address that has been disclosed to the Government and pretrial. Accordingly, I respectfully request Mr. Baez be permitted to travel to the desired location in the District of New Jersey on December 6, 2021 10:00am to 5:00pm. Pretrial and the Government do not object to this request.

Thank you for your attention to this matter.

Very truly yours,



Daniel A. McGuinness

Cc: All Counsel (via ECF)

Application GRANTED. Mr. Baez shall be permitted to travel to the District of New Jersey on December 6, 2021, between 10:00 a.m. and 5:00 p.m. for the purposes described above. The Clerk of Court is directed to close the pending motion at docket entry 215.

Date: December 3, 2021
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE